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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

BRETT PADALECKI, individually, on
behalf of himself and other similarly
situated

Plaintiff,

vs.

NATIONSTAR MORTGAGE LLC
d/b/a MR. COOPER,
Defendant.

CASE NO. 2:21-cv-0938-RFB-VCF

**FIRST STIPULATION TO
EXTEND TIME TO RESPOND
AND REPLY TO MOTION TO
DISMISS**

1 Defendant Nationstar Mortgage LLC d/b/a Mr. Cooper and Plaintiff Brett
2 Padalecki (collectively referred to as the "Parties") hereby submit the following
3 Stipulation:

4 On October 8, 2021, Plaintiff filed his First Amended Class Action Complaint
5 [ECF No. 19]. On November 19, 2021, Defendant filed a Motion to Dismiss Plaintiff's
6 First Amended Complaint [ECF No. 22]. The deadline for Plaintiff to respond to the
7 Motion to Dismiss is currently set for December 3, 2021. LR 7-2(b). The deadline for
8 Defendant to reply to in support of the Motion to Dismiss was seven days after service
9 of Plaintiff's response. *Id.*

10 The Parties desire additional time to complete to their forthcoming briefs given
11 the number of issues set forth in the Motion to Dismiss. Additionally, several related
12 putative class action cases are pending throughout the country. Counsel are still actively
13 working with counsel in the various jurisdictions to coordinate possible consolidation
14 of the matters. Given the number of cases filed in the other various jurisdictions, it has
15 taken more time than anticipated to conduct these discussions.

16 THEREFORE, the Parties hereby stipulate and agree to extend the deadline to
17 **January 3, 2022**, for Plaintiff to respond to the Motion to Dismiss. The Parties further
18 stipulate and agree to extend the deadline for Defendant to reply in support of the
19 Motion to Dismiss to **January 24, 2022**.

20 This is the first stipulation for extension of time to respond to and to reply in
21 support of the Motion to Dismiss Plaintiff's First Amended Complaint. The extension
22 is requested in good faith and is not for purposes of delay or prejudice to any party.

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1 Dated this 30th day of November, 2021.

Dated this 30th day of November, 2021.

2 **AKERMAN LLP**

MADDOX & CISNEROS LLP

3 /s/ Scott R. Lachman

/s/Norberto J. Cisneros

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Attorneys for Defendant Nationstar

Mortgage d/b/a Mr. Cooper

10 **IT IS SO ORDERED**

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15 **RICHARD E. BOULWARE, II**
16 **United States District Court**

17 DATED this 1st day of December, 2021.
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